

**DEPARTMENT OF FISH & WILDLIFE POLICY ISSUES
RELATING TO THE GROWTH MANAGEMENT ACT:
COMPREHENSIVE PLANS AND DEVELOPMENT REGULATIONS**

The Department of Fish and Wildlife has a vested interest in the Growth Management Act (GMA) because of the opportunity afforded by the GMA to reach all citizens of the state. Through the GMA, the agency wishes to carry the following messages:

1. Fish and wildlife are public resources. Fish and wildlife populations depend on the presence of adequate habitat, including the essential quantity, quality, and placement of habitat in a landscape. Landowners, agencies, governments and members of the public have a shared responsibility to protect and maintain these resources.
2. The health of an ecosystem depends on and is indicated by the biological diversity of all fish and wildlife species. It is important to maintain and/or restore Washington's biological diversity, while protecting and/or recovering individual species of concern.

Our review of comprehensive plans, as provided by the GMA, includes the assumption that comprehensive plans will meet several general, minimum requirements outlined by the legislature in the GMA. These minimum requirements include consistency of the plan with the GMA, consistency among elements of the plan, consistency of the plan with existing laws, and adequate citizen involvement in the development of the plan.

The following are the primary policy issues that will form the basis for our review of comprehensive plans:

1. A key to fish and wildlife protection is to integrate fish and wildlife management considerations in all land use decisions. High impact development must be focused away from priority fish and wildlife habitats. Lands outside critical areas are also important to fish and wildlife as they help protect critical areas from surrounding urban development. Planning for rural areas should include maintaining our managed forest and agricultural land base in addition to those designated as natural resource lands.
2. Critical areas are a central feature of the GMA. We strongly recommend that comprehensive plans include an element specifically devoted to critical areas. Such action would provide an appropriate framework upon which subsequent development would be based. If a specific critical area element is not incorporated in the comprehensive plan, then considerations of priority fish and wildlife must be addressed in other parts of the plan, including land use, housing, capital facilities, utilities, transportation, rural areas, siting of essential public facilities, open space, and urban growth boundaries.

Critical areas should be protected from land uses incompatible with fish and wildlife. Our assessment of the adequacy of protection offered by the comprehensive plan and development regulations is based on the following criteria:

- a. Protection must be extended to habitats as well as species.
 - b. The scope of habitats and species receiving protection must be broad enough to prevent the listing of species, to preserve functional amounts of important habitat types, and to support traditional or developing sport, commercial, and tribal harvests. This approach should be proactive; the inclusion of fish and wildlife considerations in land use planning should not require that they first become imperiled. We strongly believe that the most comprehensive integration of fish and wildlife concerns in land use planning will occur by incorporating WDFW's Priority Habitats and Species in local comprehensive plans and development regulations.
 - c. Protection given to habitats and species must be appropriate to the requirements of the resource. Appropriateness is related to several factors, including degree to which habitat fragmentation is avoided, scope of regulated uses and activities, adequacy of the review process for development proposals, development standards, and conditional measures that may be attached to development permits.
 - d. Wetlands, riparian areas, and nearshore marine areas are three habitat types that are particularly important to fish and wildlife and are especially vulnerable to land use changes. The fundamental threat to freshwater habitat is streamflow alteration due to impervious surfaces created by paving, rooftops, and other structures. Fish and shellfish resources are threatened by bulkheading, filling, and degraded water quality. Comprehensive plans and development regulations must protect hydrologic regimes, water quality, and adjacent upland areas. Altered stream flows from surface or groundwater withdrawal for domestic agricultural and industrial consumption should be mitigated.
3. Many species of fish and wildlife migrate great distances or utilize large areas crossing many jurisdictional boundaries. GMA planning should incorporate cross-boundary consideration for free migration and utilization for these resources.
4. The Department of Fish and Wildlife expects to be able to work cooperatively with local jurisdictions in the development and implementation of comprehensive plans and regulations. Cooperative relationships will contribute to our mandate to effectively manage our state's fish and wildlife resources, thereby maintaining Washington's rich fish and wildlife heritage.